

CARLA A. McCAULEY (State Bar No. 223910)
 carlamccauley@dwt.com
 DAVIS WRIGHT TREMAINE LLP
 865 South Figueroa Street, 24th Floor
 Los Angeles, California 90017-2566
 Tel.: (213) 633-6800 Fax: (213) 633-6899

ROBERT D. BALIN (*pro hac vice*)
 robbalin@dwt.com
 LACY H. KOONCE, III (*pro hac vice*)
 lancekoonce@dwt.com
 SAMUEL BAYARD (*pro hac vice*)
 samuelbayard@dwt.com
 GEORGE WUKOSON (*pro hac vice*)
 georgewukoson@dwt.com

DAVIS WRIGHT TREMAINE LLP
 1251 Avenue of the Americas, 21st Floor
 New York, New York 10020
 Tel.: (212) 489-8230 Fax: (212) 489-8340
 ATTORNEYS FOR PLAINTIFFS

**UNITED STATES DISTRICT COURT
 CENTRAL DISTRICT OF CALIFORNIA**

CHINA CENTRAL TELEVISION, a China
 company; CHINA INTERNATIONAL
 COMMUNICATIONS CO., LTD., a China
 company; TVB HOLDINGS (USA), INC., a
 California corporation; and DISH
 NETWORK L.L.C., a Colorado corporation,
 Plaintiffs,

vs.

CREATE NEW TECHNOLOGY (HK)
 LIMITED, a Hong Kong company; HUA
 YANG INTERNATIONAL TECHNOLOGY
 LIMITED, a Hong Kong company;
 SHENZHEN GREATVISION NETWORK
 TECHNOLOGY CO. LTD., a China
 company; CLUB TVPAD, INC., a California
 corporation; BENNETT WONG, an
 individual, ASHA MEDIA GROUP INC.
 d/b/a TVPAD.COM, a Florida corporation;
 AMIT BHALLA, an individual;
 NEWTPAD LTD. COMPANY d/b/a
 NEWTPAD.COM a/k/a TVPAD USA, a
 Texas corporation; LIANGZHONG ZHOU,
 an individual; HONGHUI CHEN d/b/a E-
 DIGITAL, an individual; JOHN DOE 1 d/b/a
 BETV; JOHN DOE 2 d/b/a YUE HAI; JOHN
 DOE 3 d/b/a 516; JOHN DOE 4 d/b/a HITV;
 JOHN DOE 5 d/b/a GANG YUE; JOHN
 DOE 6 d/b/a SPORT ONLINE; JOHN DOE 7
 d/b/a GANG TAI WU XIA; and JOHN DOES
 8-10,

Defendants.

Case No.
CV 15-1869 SVW (AJWx)

**STIPULATION FOR ENTRY
 OF [PROPOSED] CONSENT
 JUDGMENT AND
 PERMANENT INJUNCTION
 AS TO DEFENDANTS CLUB
 TVPAD, INC. AND BENNETT
 WONG**

[Proposed Consent Judgment and
 Permanent Injunction concurrently
 submitted]

Courtroom: 6

Judge: Hon. Stephen V. Wilson

Action Filed: March 13, 2015

1 This Stipulation is entered by and between Plaintiffs China Central Television,
 2 China International Communications Co., Ltd., TVB Holdings (USA), Inc. and DISH
 3 Network L.L.C. (collectively, "Plaintiffs") and Defendants Club TVpad, Inc. and
 4 Bennett Wong ("Defendants") through their respective counsel of record, with
 5 reference to the following facts:

6 1. Plaintiffs filed the Complaint in this action on March 13, 2015, against,
 7 among others, Defendants, with claims including: (1) secondary copyright
 8 infringement under the copyright laws of the United States, 17 U.S.C. § 101 *et seq.*;
 9 (2) federal trademark infringement and unfair competition under the Lanham Act, 15
 10 U.S.C. § 1125(a); (3) common law trademark infringement and unfair competition;
 11 and (4) violation of California Business and Professions Code § 17200, *et seq.*

12 2. Plaintiffs and Defendants have agreed to resolve their dispute, and have
 13 entered into a Settlement Agreement wherein Defendants have agreed to entry of a
 14 consent judgment and permanent injunctive relief in favor of Plaintiffs and in
 15 accordance with other terms as set forth in the Settlement Agreement.

16 **NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED**
 17 **that:**

18 1. A true and correct copy of the Consent Judgment and Permanent Injunction
 19 agreed to by the parties pursuant to this Stipulation and the parties' Settlement
 20 Agreement (the "Consent Judgment") is attached hereto as **Exhibit 1**;

21 2. The parties agree that all facts set forth in the Consent Judgment are true and
 22 accurate to their best knowledge and support entry of the Consent Judgment;

23 3. Defendant agrees to be bound by and abide by all permanent injunctive
 24 relief set forth in the Consent Judgment entered by the Court;

25 4. The Parties hereby enter into this Stipulation with the advice of counsel
 26 knowing its content and effect;

27 5. The Parties request that the Court enter the Consent Judgment in the
 28 form attached as **Exhibit 1**; and

1 6. The Parties request the Court retain jurisdiction to enforce the Consent
2 Judgment, once entered, as required.

3 So Stipulated.

4 DATED: March 4, 2016

DAVIS WRIGHT TREMAINE LLP
CARLA A. McCAULEY
ROBERT D. BALIN (*pro hac vice*)
LACY H. KOONCE, III (*pro hac vice*)
SAMUEL BAYARD (*pro hac vice*)
GEORGE WUKOSON (*pro hac vice*)

9 By: /s/Carla A. McCauley
Carla A. McCauley

10 Attorneys for Plaintiffs
11 CHINA CENTRAL TELEVISION; CHINA
12 INTERNATIONAL COMMUNICATIONS
13 CO., LTD.; TVB HOLDINGS (USA), INC.;
AND DISH NETWORK L.L.C.

14 DATED: March 4, 2016

RYU LAW FIRM

16 By: /s/Francis Ryu
Francis Ryu

18 Attorneys for Defendants
19 CLUB TVPAD, INC. AND BENNETT
20 WONG
21
22
23
24
25
26
27
28